

Ekwan E. Rhow (CA SBN 174604)
erhow@birdmarella.com
Marc E. Masters (CA SBN 208375)
mmasters@birdmarella.com
Christopher J. Lee (CA SBN 322140)
clee@birdmarella.com
BIRD, MARELLA, BOXER,
WOLPERT, NESSIM, DROOKS,
LINCENBERG & RHOW, P.C.
1875 Century Park East, 23rd Floor
Los Angeles, California 90067-2561
Telephone: (310) 201-2100
Facsimile: (310) 201-2110

Jonathan M. Rotter (CA SBN 234137)
Kara M. Wolke (CA SBN 241521)
Gregory B. Linkh (pro hac vice)
GLANCY PRONGAY & MURRAY,
LLP
1925 Century Park East, Suite 2100
Los Angeles, California 90067-2561
Telephone: (310) 201-9150
jrotter@glancylaw.com
kwolke@glancylaw.com
glinkh@glancylaw.com

Attorneys for Plaintiff Bernadine Griffith

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BERNADINE GRIFFITH, individually
and on behalf of all others similarly
situated,

Plaintiff.

vs.

TIKTOK, INC., a corporation;
BYTEDANCE, INC., a corporation

Defendants.

Case No. 5:23-cv-00964-SB-E
DISCOVERY MATTER

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION TO
COMPEL PRODUCTION OF
CURRENT AND HISTORICAL
SOURCE CODE**

Magistrate Judge: Hon. Charles Eick
Date: April 19, 2024
Time: 9:30 AM
Place: Ctrm. 750

Action Filed: May 26, 2023
Trial Date: November 25, 2024

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on April 19, 2024, at 9:30 a.m., in the
3 courtroom of the Honorable Charles F. Eick, United States Magistrate Judge, located
4 at the Roybal Federal Building and United States Courthouse, 255 East Temple
5 Street, Los Angeles, CA, 90012, Courtroom 750, 7th Floor, Plaintiff will and hereby
6 does move pursuant to Federal Rule of Civil Procedure 37 for an order compelling
7 Defendants to produce,

8 This motion is made following the conferences of counsel pursuant to L.R. 7-
9 3 and L.R. 37-1 which took place on January 17, 2024.

10 This motion to compel is based upon this notice, the concurrently filed joint
11 stipulation, the exhibits and declarations attached thereto, the pleadings and records
12 on file in this action and such other matters as the Court deems necessary and proper.

13 Dated: March 29, 2024

14 By: /s/ Jonathan M. Rotter
15 Jonathan M. Rotter (CA SBN 234137)
Kara M. Wolke (CA SBN 241521)
Gregory B. Linkh (*pro hac vice*)
**GLANCY PRONGAY & MURRAY,
LLP**
16 1925 Century Park East, Suite 2100
17 Los Angeles, California 90067-2561
Telephone: (310) 201-9150
jrotter@glancylaw.com
kwolke@glancylaw.com
glinkh@glancylaw.com

18 Ekwan E. Rhow (CA SBN 174604)
Marc E. Masters (CA SBN 208375)
Christopher J. Lee (CA SBN 322140)
**BIRD, MARELLA, BOXER,
WOLPERT, NESSIM, DROOKS,
LINCENBERG & RHOW, P.C.**
19 1875 Century Park East, 23rd Floor
Los Angeles, California 90067-2561
Telephone: (310) 201-2100
erhow@birdmarella.com
mmasters@birdmarella.com
clee@birdmarella.com

20 Kalpana Srinivasan (CA SBN 237460)
Steven Sklaver (CA SBN 237612)
Michael Gervais (CA SBN 330731)
SUSMAN GODFREY L.L.P.
21 1900 Avenue of the Stars, Suite 1400

1 Los Angeles, CA 90067
2 Telephone: (310) 789-3100
3 Facsimile: (310) 789-3150
4 ksrinivasan@susmangodfrey.com
5 ssklaver@susmangodfrey.com
6 mgervais@susmangodfrey.com

7 Y. Gloria Park (pro hac vice)
8 **SUSMAN GODFREY L.L.P.**
9 1301 Avenue of the Americas, 32nd Floor
10 New York, NY 10019
11 Telephone: (212) 336-8330
12 Facsimile: (310) 336-8340
13 gpark@susmangodfrey.com

14 *Attorneys for Plaintiff Bernadine Griffith*

15
16
17
18
19
20
21
22
23
24
25
26
27
28